

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**UNITED STATES OF AMERICA**

**VS.**

**CASE NO.: 11-00186-01S**

**JOSEPH CARAMADRE**

**MOTION TO PERMIT DEFENDANT, JOSEPH CARAMADRE,  
TO ATTEND MOTHER'S WAKE AND FUNERAL**

Now comes the Defendant, Joseph Caramadre, in the above-entitled matter, and requests permission from this Honorable Court to attend the wake and funeral of his mother, Yolanda Caramadre.

Mrs. Caramadre passed away on Sunday afternoon December 1, 2013 at Rhode Island Hospital. (Death Certificate Attached) Mrs. Caramadre's wake will be held on Friday, December 6, 2013 from 4:00 to 8:00 p.m. at the Nardolillo Funeral Home, 1278 Park Avenue, Cranston, Rhode Island (401-942-1220).

Mrs. Caramadre's funeral will be held on Saturday, December 7, 2013 at 9:30 a.m. from Nardolillo Funeral Home with a mass at 11:00 a.m. at Holy Apostles Church, 800 Pippin Orchard Road, Cranston, RI, followed by burial in St. Ann's Cemetery, Cranston, RI.

The Defendant is requesting that he be released from incarceration at the Donald W. Wyatt Detention Facility to the custody of the United States Marshall's Service to attend both the wake on December 6, 2013 and funeral service and burial on December 7, 2013. Mr. Caramadre agrees to pay for the costs of the United States Marshall's Service detail unit to attend the wake and funeral.

As basis for his Motion the Defendant avers the following:

1. He is a first time offender.
2. He has been convicted of a non-violent crime.
3. He is a life-long Rhode Island resident.

WHEREFORE, your Defendant prays his Motion be Granted.

Respectfully submitted,  
Joseph Caramadre,  
By his Attorney,

/s/ William J. Murphy  
Murphy & Fay, LLP  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of December, 2013, I filed this document electronically and that it is available for viewing and downloading from the ECF system. This document was served by electronic mail upon:

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